

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH, individually  
and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

ROCKET MORTGAGE, LLC, a Michigan  
limited liability company,

Case No. 1:22-cv-00346-JL

*Defendant.*

**DECLARATION OF VIRGINIA DASCHBACH**

I, Virginia Daschbach, on oath declare as follows:

1. I am over the age of eighteen (18), and I make this declaration in support of my motion for substitution pursuant to Fed. R. Civ. P. 25. I am able to testify to the matters set forth herein if called upon to do so. I make the following statements based on my own personal knowledge.

2. I am the surviving spouse of Richard J. Daschbach, who was the Plaintiff in the above-referenced case. We were married in 1958 and together have three daughters.

3. My husband, Richard J. Daschbach, passed away on December 5, 2023, in Exeter, New Hampshire.

4. My late husband executed a Last Will and Testament, in which he appointed me as the executor of his estate and designated me as the sole beneficiary of his assets. No proceeding is pending in the State of New Hampshire for the administration of my husband's estate, and I do not anticipate filing for an administration of my husband's estate.

5. Rather, my husband established a revocable trust. Under the terms of the trust, I

am the sole beneficiary and a co-trustee.

6. I am respectfully requesting to be substituted for my husband as a proper party in the lawsuit pending in the District of New Hampshire and captioned *Daschbach v. Rocket Mortgage, LLC*, Case No. 1:22-cv-00346-JL.

7. No other person has a superior right to be substituted for my husband in the pending action. I wish to proceed with my late husband's claims, including as the putative class representative, and will assume all roles and responsibilities associated with said duties.

8. I have knowledge of the facts of the case and will diligently prosecute the action on my husband's behalf.

9. I have retained the Woodrow & Peluso, LLC law firm to represent me in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 03 / 12 / 2024 in the State of New Hampshire.

By:   
Virginia Daschbach